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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA	)	CASE NO. CR 12-0625 WHA
	)	
v.	)	STIPULATION FOR PROTECTIVE ORDER; AND
	)	<del>PROPOSED</del> PROTECTIVE ORDER
JAIME BALAM,	)	
a/k/a "Tweety,"	)	
	)	
Defendant.	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties, through their undersigned counsel,  
that the ~~Proposed~~ Protective Order set forth below may be entered by the Court.

DATED: April 9, 2015

Respectfully submitted,

MELINDA HAAG  
United States Attorney

/S/  
ANDREW M. SCOBLE  
Assistant United States Attorney

//

1 DATED: April 9, 2015

/S/  
2 RICHARD L. TAMOR  
3 Counsel for Defendant Jaime Balam

4 ~~PROPOSED~~ PROTECTIVE ORDER

5 (1) The government asserts that general dissemination of certain “Protected Material” may  
6 jeopardize the safety of certain individuals.

7 (2) The term “Protected Material” applies to any and all materials that disclose or reasonably  
8 suggest the identity or whereabouts of Protected Witnesses, including social security numbers, dates of  
9 birth, driver’s license numbers, and other such personal information.

10 (3) In order to address these potential safety concerns, dissemination and possession of the  
11 Protected Material shall be limited to the following persons:

- 12 (a) counsel for the defendant in the above-captioned matter;  
13 (b) investigative, secretarial, clerical, paralegal and student personnel employed full-  
14 time or part-time by counsel for the defendant;  
15 (c) independent expert witnesses, investigators, translators, or advisors retained by  
16 the defendant in connection with this action; and  
17 (d) such other persons as hereafter may be authorized by the Court upon motion by  
18 the defendant.

19 (4) Possession and use of the Protected Material by the persons listed in Paragraphs 3(a)-(d)  
20 are only for the purpose of preparing for and trying the criminal case of the defendant, and for no other  
21 purpose.


22 (5) Other than use during the trial of the defendant, the Protected Material shall not be  
23 distributed, shown, or disseminated to anyone else, including counsel for any other defendant who was  
24 charged in the underlying case captioned CR 08-0730 WHA and/or to any witness or potential witness,  
25 nor shall the Protected Material be distributed, shown, or disseminated to anyone during the course of  
26 any defense investigation. The defendant may review Protected Material in the presence of counsel or  
27 any other person designated under Paragraphs 3(b)-(d), but Protected Material shall not be left in the  
28 custody of the defendant, nor shall the defendant be allowed to make copies of or to copy information  
from Protected Material. Review of Protected Material by the defendant in the presence of his counsel

1 or other designated persons may be conducted with the aid of an interpreter. Unless the interpreter is a  
2 designated person under Paragraph 3 of the Protective Order, the interpreter shall not retain possession  
3 of any Protected Material outside the presence of counsel or other designated person. The persons listed  
4 in Paragraphs 3(a)-(d) may discuss Protected Witnesses with the defendant. Nevertheless, during these  
5 discussions, the persons designated under Paragraphs 3(a)-(d) shall not disclose to the defendant any  
6 personal identification information of a Protected Witness – such as address, telephone number, date of  
7 birth, and social security number – other than the Protected Witness’s name.

8 (6) At the end of the trial of the defendant, counsel for the defendant shall return all the  
9 Protected Material, and any and all copies of the Protected Material, to the government, which will  
10 preserve the materials in case there is need for them in any future litigation.

11 IT IS SO ORDERED.

12  
13 DATED: April 13, 2015.

14   
HON. WILLIAM H. ALSUP  
United States District Judge